

## LETTER OF REQUEST COMMISSION ROGATOIRE

Hague Convention of 18 March 1970 on the  
Taking of Evidence Abroad in Civil or Commercial Matters  
*Convention de La Haye du 18 mars 1970 sur  
l'obtention des preuves à l'étranger en matière civile ou commerciale*

1.	<b>Sender</b> <i>Expéditeur</i>	Robert A. Delafield II, Nelson Bumgardner Conroy PC 3131 West 7th St., Suite 300, Fort Worth, TX 76107 USA (With the permission of the Requesting Authority)
2.	<b>Central Authority of the Requested State</b> <i>Autorité centrale de l'État requis</i>	Ministry of Justice of China, International Legal Cooperation Center 33, Pinganli Xidajie, Xicheng District, Beijing 100035, China
3.	<b>Person to whom the executed request is to be returned</b> <i>Personne à qui les pièces constatant l'exécution de la demande doivent être renvoyées</i>	Clerk US District Court for the Western District of Texas 800 Franklin Ave., Rm. 380, Waco, TX 76701 USA
4.	<b>Specification of the date by which the requesting authority requires receipt of the response to the Letter of Request</b> <i>Indiquer la date limite à laquelle l'autorité requérante désire recevoir la réponse à la commission rogatoire</i>	
	<b>Date</b> <i>Date limite</i>	May 13, 2022.
	<b>Reason for urgency*</b> <i>Raison de l'urgence</i>	The trial is scheduled to begin on June 13, 2022.

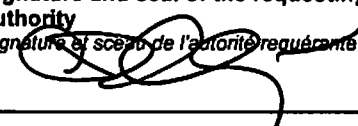
In conformity with Article 3 of the Convention, the undersigned applicant has the honour to submit the following request:

*En conformité de l'article 3 de la Convention, le requérant soussigné a l'honneur de présenter la demande suivante :*

5. a	<b>Requesting authority</b> <b>(Art. 3(a))</b> <i>Autorité requérante</i> <i>(art. 3(a))</i>	United States District Court for the Western District of Texas
b	<b>To the Competent Authority of</b> <b>(Art. 3(a))</b> <i>À l'Autorité compétente de</i> <i>(art. 3(a))</i>	The People's Republic of China
c	<b>Names of the case and any identifying number</b> <i>Nom de l'affaire et numéro d'identification de l'affaire</i>	Unification Technologies LLC v. Micron Technology, Inc., et al., Civ. A. No. 6:20-CV-500

6.	<b>Names and addresses of the parties and their representatives (including representatives in the Requested State*) (Art. 3(b))</b> <i>Identité et adresse des parties et de leurs représentants (y compris représentants dans l'État requis) (art. 3(b))</i>	
a	<b>Plaintiff</b> <i>Demandeur</i>	Unification Technologies LLC
	<b>Representatives</b> <i>Représentants</i>	See Attachment A
b	<b>Defendant</b> <i>Défendeur</i>	Micron Technology, Inc., Micron Semiconductor Products, Inc., and Micron Technology Texas LLC

c	<b>Representatives</b> <i>Représentants</i>	See Attachment A
	<b>Other parties</b> <i>Autres parties</i>	Not Applicable
	<b>Representatives</b> <i>Représentants</i>	Not Applicable
7. a	<b>Nature of the proceedings (divorce, paternity, breach of contract, product liability, etc.) (Art. 3(c))</b> <i>Nature et objet de l'instance (divorce, filiation, rupture de contrat, responsabilité du fait des produits, etc.) (art. 3(c))</i>	Civil action seeking damages for patent infringement.
b	<b>Summary of complaint</b> <i>Exposé sommaire de la demande</i>	See Attachment B
c	<b>Summary of defence and counterclaim*</b> <i>Exposé sommaire de la défense ou demande reconventionnelle</i>	See Attachment B
d	<b>Other necessary information or documents*</b> <i>Autres renseignements ou documents Utiles</i>	A copy of the complaint and the answer are attached to this request.
8. a	<b>Evidence to be obtained or other judicial act to be performed (Art. 3(d))</b> <i>Actes d'instruction ou autres actes judiciaires à accomplir (art. 3(d))</i>	The Requesting Authority requests that the competent authorities of the People's Republic of China compel the production of documents and compel the testimony specified on Attachment C.
b	<b>Purpose of the evidence or judicial act sought</b> <i>But des actes à accomplir</i>	The evidence sought is relevant to proof of patent infringement.
9.	<b>Identity and address of any person to be examined (Art. 3(e))*</b> <i>Identité et adresse des personnes à entendre (art. 3(e))</i>	Memblaze Technology Co., Ltd., Building B2, Dongsheng Park, 66 Xixiaokou Rd., Haidan District, Beijing 100192, China
10.	<b>Questions to be put to the persons to be examined or statement of the subject matter about which they are to be examined (Art. 3(f))*</b> <i>Questions à poser ou faits sur lesquels les personnes susvisées doivent être entendues (art. 3(f))</i>	See Attachment C
11.	<b>Documents or other property to be inspected (Art. 3(g))*</b> <i>Documents ou objets à examiner (art. 3(g))</i>	See Attachment C

12.	<b>Any requirement that the evidence be given on oath or affirmation and any special form to be used (Art. 3(h))*</b> <i>Demande de recevoir la déposition sous serment ou avec affirmation et, le cas échéant, indication de la formule à utiliser (art. 3(h))</i>	The testimony should be given on oath. No particular form is required.
13.	<b>Special methods or procedure to be followed (e.g., oral or in writing, verbatim transcript or summary, cross-examination, etc.) (Arts 3(i) and 9)*</b> <i>Formes spéciales demandées (déposition orale ou écrite, procès-verbal sommaire ou intégral, "cross-examination", etc.) (art. 3(i) et 9)</i>	See Attachment D
14.	<b>Request for notification of the time and place for the execution of the Request and identity and address of any person to be notified (Art. 7)*</b> <i>Demande de notification de la date et du lieu de l'exécution de la requête, de l'identité et de l'adresse de la ou des personnes à informer (art. 7)</i>	The Requesting Authority requests that the representatives of the parties identified on Attachment A be given advance notice of all proceedings related to execution of the letter of request by email at the addresses given on the Attachment.
15.	<b>Request for attendance or participation of judicial personnel of the requesting authority at the execution of the Letter of Request (Art. 8)*</b> <i>Demande d'assistance ou de participation des magistrats de l'autorité requérante à l'exécution de la commission rogatoire (art. 8)</i>	Not Applicable
16.	<b>Specification of privilege or duty to refuse to give evidence under the law of the Requesting State (Art. 11(b))*</b> <i>Spécification des dispenses ou interdictions de déposer prévues par la loi de l'État requérant (art. 11(b))</i>	The witness may refuse to give evidence if it has a privilege under the law of the United States or the law of China. Privileges under US law include the attorney-client privilege and, for natural persons, the privilege against self-incrimination.
17.	<b>The fees and costs incurred which are reimbursable under the second paragraph of Article 14 or under Article 26 of the Convention will be borne by:*</b> <i>Les taxes et frais donnant lieu à remboursement en vertu de l'article 14, alinéa 2 et de l'article 26 seront réglés par :</i>	The plaintiff, Unification Technologies LLC.
<b>Date of request</b> <i>Date de la requête</i> 11/2/2021		
<b>Signature and seal of the requesting authority</b> <i>Signature et sceau de l'autorité requérante</i> 		

\*Omit if not applicable / Ne remplir qu'en cas de nécessité